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BRENTON PACHECO

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GEOFFREY PETERSON, BRANDON
MILLER and BRENTON PACHECO,
individually and on behalf of others
similarly situated,

Plaintiffs,

v.

WALGREEN CO., and DOES 1 through
100, Inclusive,

Defendants.

Case No. 2:13-CV-07290-PSG
(FFMx)

Hon. Margaret M. Morrow

**JOINT STIPULATION TO
CONSOLIDATE CASE WITH
RELATED CONSOLIDATED
CASES**

*[Filed Concurrently with Proposed
Order]*

Complaint Filed: November 7, 2012

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23 Attorneys for Plaintiffs GEOFFREY PETERSON, BRANDON MILLER
24 and BRENTON PACHECO
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1 Plaintiffs GEOFFREY PETERSON, BRANDON MILLER and BRENTON
2 PACHECO (collectively “Plaintiffs”) and Defendant WALGREEN CO.
3 (“Defendant” or “Walgreens”) by and through their respective undersigned
4 counsel, hereby stipulate and jointly request that the Court issue an order as
5 follows:

6 **WHEREAS**, this case was transferred from the United States District Court,
7 for Eastern District of California, to this Court pursuant to the parties’ stipulation
8 and the Court’s Order dated September 30, 2013.

9 **WHEREAS**, this case is related to a putative class lawsuit brought against
10 Defendant in this Court titled *Chris McDowell, Gustavo Villavelazquez, Devon*
11 *Brown v. Walgreen Co.*, Case No. CV13-1028 PSG FFMx
12 (“*McDowell/Villavelazquez/Brown Case*”), which was filed subsequent to the
13 instant Case. The *McDowell/Villavelazquez/Brown Case* and this case includes
14 claims for failure to reimburse employee business expenses arising out of the same
15 basic factual allegations related to Defendants’ employees use of their personal
16 vehicles to conduct interstore transfers of Defendant’s merchandise.

17 **WHEREAS**, the *McDowell/Villavelazquez/Brown Case* has been
18 consolidated with seven putative class cases pending in the United States District
19 Court for the Central District of California, before the Honorable Judge Philip S.
20 Gutierrez (*i.e.*, *George Wilson, Tanarica Martin v. Walgreen Co.*, Case no. CV11-
21 7664 PSG (FFMx), *Rene Hodach, Winston Bolles v. Walgreen Co.*, Case No. CV12-
22 7491 PSG-FFMx; *Brenda Brown v. Walgreen Co.*, Case No. CV12-8574 PSG-
23 FFMx; *Emad Gindi v. Walgreen Co.*, Case No. CV13-001154 PSG-FFMx; *Shane*
24 *Jerominski, Alicia Arenas v. Walgreen Co.*, Case No. CV12-10134 PSG-FFMx;
25 *Michael Hanna v. Walgreen Co.*, Case No. CV13-0214 PSG-FFMx; and *Kevork*
26 *Shahinian v. Walgreen Co.*, Case No. CV13-03576 PSG-FFMx (hereinafter
27 referred to as the “Consolidated Cases”));
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1 **WHEREAS**, on October 16, 2013, Defendant filed a Notice of Related
2 Cases identifying the Consolidated Cases as related to the instant Case.

3 **WHEREAS**, this Case was transferred from Judge Margaret M. Marrow to
4 Judge Philip S. Gutierrez pursuant to an Order issued on October 25, 2013.

5 **WHEREAS**, consolidation of this Case with the Consolidated Cases is in
6 the interests of the Parties, in that it will promote efficiency and help to facilitate
7 settlement.

8 **NOW, THEREFORE**, the Parties agree and stipulate that this case should
9 be consolidated with the Consolidated Cases, lead case: *George Wilson et.al. v.*
10 *Walgreen Co.*, Case no. CV11-7664 PSG (FFMx).

11 DATED: November 5, 2013 SEYFARTH SHAW LLP

12
13 By: /s/ Jill A. Porcaro
14 Jill A. Porcaro
15 Attorneys for Defendant
16 WALGREEN CO.

16 DATED: November 5, 2013 ACKERMANN & TILAJEF, P.C.
17 THE MALK LAW FIRM
18 UNITED EMPLOYEES LAW GROUP

19 /s/ Craig J. Ackermann

20 CRAIG J. ACKERMANN
21 Attorneys for Plaintiffs GEOFFREY PETERSON,
22 BRANDON MILLER and BRENTON PACHECO

22 Pursuant to Local Rule 5-4.3.4(2)(ii), I Jill Porcaro hereby attest that the
23 content of this document is acceptable to counsel for Plaintiffs, and that I have
24 obtained authorization to affix his electronic signature to this document.
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